

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE CONSUMER ADVOCATE

Classification and Fees For Confirm )

Docket No. MC2002-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS JOE LUBENOW  
(OCA/USPS-T2-1-7)  
May 8, 2002

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-18 dated May 1, 2002, are hereby incorporated by reference.

Respectfully submitted,

  
KENNETH E. RICHARDSON  
Attorney

SHELLEY S. DREIFUSS  
Director  
Office of the Consumer Advocate

1333 H Street, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T2-1. Please turn to your testimony at 1, lines 20-21, wherein you state that much is to be gained if the Postal Service can become a “glass box”. Given that consumers have time dependent postal needs similar to those of major mailers—for example, the need to know when a mortgage payment will be received in a distant state given that routings and delivery times are not totally a function of distance--do you believe that there is also much to be gained if the “glass box” theory is applied further by extending Confirm service to individual consumers? If your answer is positive, please provide details. If your answer is negative, please provide the justification for your conclusion(s).

OCA/USPS-T2-2. On page 2 of your testimony you state that the Mailers Technical Advisory Committee (MTAC) “set out to provide a means to track ordinary mail pieces on their journey through the postal system.”

- a. At the outset of the tracking program, was it the intention of the MTAC to find a way to track all First-Class mail as well as other classes of mail? If not, please explain.
- b. At the outset of the tracking program, were there any limitations established by MTAC as to the types of mail pieces or types of mailers whose mail was to be tracked? If so, please explain.

OCA/USPS-T2-3. At page 8, lines 12-14, of your testimony, you suggest that “A matrix could fairly easily be developed allowing internal comparisons and determination of relative efficiencies and where bottlenecks are occurring.”

- a. Do you have in your possession any documents drawing such comparisons or determining relative efficiencies or where bottlenecks are occurring?
- b. If so, please provide any materials in your possession drawing internal postal service mail processing comparisons or documents determining the relative efficiencies of Postal Service processing operations or where bottlenecks are occurring.

OCA/USPS-T2-4. Please refer to your testimony at page 9, lines 4-5. Are mailers continuing to have any difficulties placing two barcodes on the same mail piece? If so, what are the difficulties?

OCA/USPS-T2-5. Is it currently technologically feasible to expand the PLANET Code to more than fourteen digits? If so, are there any MTAC plans to attempt to expand the number of digits in the PLANET Code?

OCA/USPS-T2-6. Please refer to your testimony on page 11, lines 21-23.


- a. How many specialty service firms are there currently that will handle the PLANET Code application and subsequent reporting and where are they located?
- b. Please explain more fully what you mean by "PLANET Code application."
- c. Please explain the type of reporting the specialty firms will handle.

OCA/USPS-T2-7. Please refer to page 12, lines 10-15, of your testimony discussing the tests by International Post Corporation for tracking ordinary letter mail.

- a. Please describe the results of the International Post Corporation tests of mail tracking of ordinary letter mail using mail piece barcodes on the back of the letters.
- b. Please describe the advantages and disadvantages of the process tested by the International Post Corporation, particularly in comparison to the CONFIRM service.
- c. Do you believe the International Post Corporation method of tracking could be implemented by the Postal Service without unreasonably difficult technical problems?
- d. Does MTAC have any plans to encourage the Postal Service to implement the International Post Corporation method of tracking mail?
- e. If introduced, could the International Post Corporation method supercede the CONFIRM service?

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

  
Kenneth E. Richardson

Washington, D.C. 20268-0001  
May 8, 2002